

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CHAO SUN, on behalf of himself and all others similarly situated,	§	Civil Action No. 2:15-cv-
	§	00703(JLL)(JAD)
	§	
Plaintiff,	§	<b>ECF Case</b>
	§	<b>Electronically Filed</b>
	§	
v.	§	<b>Motion Day:</b> December 21, 2015
	§	
	§	NOTICE OF DEFENDANT
	§	MAZARS CPA LIMITED'S
	§	MOTION TO DISMISS
HAN, et al.	§	PLAINTIFF'S AMENDED
	§	COMPLAINT
	§	
Defendants.	§	<b><u>Oral Argument Requested</u></b>

PLEASE TAKE NOTICE that on October 2, 2015, Defendant Mazars CPA Limited ("Mazars CPA"), by and through their counsel, Norton Rose Fulbright US LLP, shall and hereby do move before the Honorable Jose L. Linares, United States District Judge for the District of New Jersey, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an order dismissing the Amended Complaint in the above-referenced action with prejudice pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure, and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 *et seq.*

PLEASE TAKE FURTHER NOTICE that in support of the Motion to Dismiss, counsel for Mazars CPA will rely upon the accompanying Memorandum of Law in Support of Defendant Mazars CPA's Motion to Dismiss Plaintiff's Amended Complaint, the Declaration of Felice Galant, executed October 2, 2015, and the Proposed Form of Order, as well as all pleadings and other documents filed with the Court in this matter.

PLEASE TAKE FURTHER NOTICE that the Mazars CPA requests oral argument.

Dated: October 2, 2015

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Felice B. Galant  
Felice B. Galant  
666 Fifth Avenue  
New York, New York 10103  
Telephone: (212) 318-3000  
Facsimile: (212) 318-3400  
[felice.galant@nortonrosefulbright.com](mailto:felice.galant@nortonrosefulbright.com)

*Attorneys for Defendant Mazars CPA  
Limited*

OF COUNSEL:

NORTON ROSE FULBRIGHT US LLP

Scott P. Drake (pro hac vice application forthcoming)

Tyler H. Lipp (pro hac vice application forthcoming)

2200 Ross Ave, Suite 3600

Dallas, Texas 75201

Telephone: (214) 855-8000

Facsimile: (214) 855-8200

[scott.drake@nortonrosefulbright.com](mailto:scott.drake@nortonrosefulbright.com)

[tyler.lipp@nortonrosefulbright.com](mailto:tyler.lipp@nortonrosefulbright.com)